

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SUOMEN COLORIZE OY,

Plaintiff,

V.

C.A. No. 12-715-CJB

VERIZON SERVICES CORP.,
VERIZON ONLINE LLC, and
VERIZON DELAWARE LLC,

Defendants.

STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED by Plaintiff Suomen Colorize Oy (“SCO”) and Defendants Verizon Services Corp., Verizon Online LLC, and Verizon Delaware LLC (“Verizon”), subject to approval of the Court, that the current case schedule be extended such that dates for expert depositions, dispositive motions, and trial will be set based on the claim construction Order in this case. As set forth herein, the parties believe that there is good cause for this extension and that it will simplify the issues for summary judgment and trial.

The Court set a Scheduling Order in this case on August 27, 2012. [D.I. 18.] The parties previously have requested, and the Court has entered, short extensions of the expert report schedule. [D.I. 139, 142, 145.] On February 5, 2014, the parties completed expert reports in accordance with the stipulated schedule that the parties submitted and the Court approved. [D.I. 145.]

Having reviewed each other's expert reports and other information exchanged in this case, the parties believe that the issues to be presented for summary judgment and trial may be simplified greatly by the claim construction Order in this case and that scheduling future dates

based off of the date of the claim construction Order will serve judicial economy and conserve the resources of the parties, including by having the parties' summary judgment positions briefed under a single set of claim constructions and not argued based on alternative claim construction outcomes and alternative theories of infringement and invalidity. The parties believe that the likely simplification of issues after claim construction constitutes good cause to amend the case schedule.

Accordingly, the parties stipulate to and jointly request that the Court enter the following schedule:

1. Expert depositions shall be completed 25 days after a claim construction Order is entered.
2. Dispositive motions shall be due 25 days after the completion of expert depositions.
3. A trial date shall be set for a prompt date of the Court's convenience at a scheduling conference to be held after the resolution of the parties' dispositive motions.

Respectfully submitted,

BAYARD, P.A.

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Counsel for Defendants Verizon Services Corp., Verizon Online LLC, and Verizon Delaware LLC

Dated: February 11, 2014

SO ORDERED, this _____ day of _____, 2014.

THE HONORABLE CHRISTOPHER J. BURKE
UNITED STATES MAGISTRATE JUDGE